

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JUSTIN RYAN BEAR RUNNER;
JUSTIN RAYMOND BEAR RUNNER;
MILENA SALMERON; and
ANGELA SALMERON

INDICTMENT

Case No. 3:16-CR-160

Violation: 18 U.S.C. §§ 113(a)(1),
113(a)(3), 113(a)(4), 113(a)(6), 373,
1152, and 1153; and N.D.C.C.
12.1-18-01

COUNT ONE

Assault with Intent to Commit Murder

The Grand Jury Charges:

On or about June 9, 2016, in the District of North Dakota, in Indian country,
within the exclusive jurisdiction of the United States,

JUSTIN RYAN BEAR RUNNER and
JUSTIN RAYMOND BEAR RUNNER,

both Indians, did knowingly and willfully assault Eugene Houle, an Indian, with intent to
commit murder by beating him with baseball bats;

In violation of Title 18, United States Code, Sections 113(a)(1) and 1153.

COUNT TWO

Assault Resulting in Serious Bodily Injury

The Grand Jury Further Charges:

On or about June 9, 2016, in the District of North Dakota, in Indian country,
within the exclusive jurisdiction of the United States,

JUSTIN RYAN BEAR RUNNER and
JUSTIN RAYMOND BEAR RUNNER,

both Indians, did assault Eugene Houle, an Indian, resulting in serious bodily injury;

In violation of Title 18, United States Code, Sections 113(a)(6) and 1153.

COUNT THREE

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about June 9, 2016, in the District of North Dakota, in Indian country,
within the exclusive jurisdiction of the United States,

JUSTIN RYAN BEAR RUNNER and
JUSTIN RAYMOND BEAR RUNNER,

both Indians, did assault Eugene Houle with dangerous weapons, namely, baseball bats,
with intent to do bodily harm and without just cause and excuse;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1153.

COUNT FOUR

Assault with a Dangerous Weapon

The Grand Jury Further Charges:

On or about June 9, 2016, in the District of North Dakota, in Indian country,
within the exclusive jurisdiction of the United States,

ANGELA SALMERON,

a non-Indian, did assault Eugene Houle with a dangerous weapon, namely, a broomstick,
with intent to do bodily harm and without just cause and excuse;

In violation of Title 18, United States Code, Sections 113(a)(3) and 1152.

COUNT FIVE

Assault by Striking, Beating, or Wounding

The Grand Jury Further Charges:

On or about June 9, 2016, in the District of North Dakota, in Indian country,
within the exclusive jurisdiction of the United States,

ANGELA SALMERON,

a non-Indian, did assault Eugene Houle by striking, beating, or wounding;

In violation of Title 18, United States Code, Sections 113(a)(4) and 1152.

COUNT SIX

Solicitation to Commit a Crime of Violence

The Grand Jury Further Charges:

On or about June 9, 2016, in the District of North Dakota,

MILENA SALMERON,

with the intent that JUSTIN RYAN BEAR RUNNER engage in conduct constituting a felony that has as an element the use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, and endeavor to persuade JUSTIN RYAN BEAR RUNNER, an Indian, to engage in such conduct, that is, to assault Eugene Houle with a dangerous weapon and with intent to do bodily harm, in Indian country and within the exclusive jurisdiction of the United States, in violation of Title 18, United States Code, Sections 113(a)(3) and 1153;

In violation of Title 18, United States Code, Section 373.

COUNT SEVEN

Solicitation to Commit a Crime of Violence

The Grand Jury Further Charges:

On or about June 9, 2016, in the District of North Dakota,

MILENA SALMERON,

with the intent that JUSTIN RAYMOND BEAR RUNNER engage in conduct constituting a felony that has as an element the use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce, and endeavor to persuade JUSTIN RAYMOND BEAR RUNNER, an Indian, to engage in such conduct, that is, to assault Eugene Houle with a dangerous weapon and with intent to do bodily harm, in Indian country and within the exclusive jurisdiction of the United States, in violation of Title 18, United States Code, Sections 113(a)(3) and 1153;

In violation of Title 18, United States Code, Section 373.

COUNT EIGHT

Kidnapping

The Grand Jury Further Charges:

On or about June 9, 2016, in the District of North Dakota, in Indian country,
within the exclusive jurisdiction of the United States,

JUSTIN RAYMOND BEAR RUNNER,

an Indian, did knowingly and willfully restrain Eugene Houle, an Indian, with intent to
prevent his liberation by endangering and threatening to endanger his safety, and
continued to restrain Eugene Houle with intent to commit a felony or attempt to commit a
felony, to wit: assault with a dangerous weapon;

In violation of North Dakota Century Code 12.1-18-01, and Title 18, United States
Code, Section 1153.

A TRUE BILL:

/s/ Foreperson
Foreperson

/s/ Christopher C. Myers
CHRISTOPHER C. MYERS
United States Attorney

MDG/vlt